

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Richard Graham,

Plaintiff,

-vs-

Truist Bank,

Defendant.

Case No. 3:24-cv-05817-SAL

**PLAINTIFF'S ANSWERS TO LOCAL CIVIL RULE 26.01
INTERROGATORIES**

Plaintiff, by and through the undersigned counsel, respond to District of South Carolina Local Civil Rule 26.01 Interrogatories, as follows:

- A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of same interest.

RESPONSE: None known at this time.

- B. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: Plaintiff's claims should be tried by jury. Plaintiff's causes of action are actions at law which are tried by a jury under controlling law.

- C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia or ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Plaintiff is an individual.

- D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: This action was removed to the United States District Court, Division of Columbia, by Defendant Truist Bank.

- E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transaction, happenings or events; involve the identical parties or property; or for any reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: None.

- F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable.

- G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: Not applicable.

- H. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be

supplemented when any later event occurs that would affect the court's jurisdiction under § 1332(a).

RESPONSE: Not applicable.

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DATED: October 15, 2024

Columbia, South Carolina